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Attorney for Debtor: CHARLANNE BROWN

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

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In re

CHARLANNE BROWN

Debtor.

CASE NO.: 10-36394-A-7

D.C. NO.: JSO-001

DATE: August 23, 2010

TIME: 9:00 A.M.

CTRM: 28, 7th Floor

JUDGE: MC MANUS

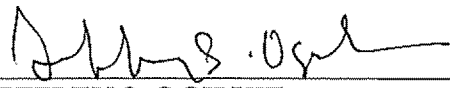
MOTION TO COMPEL CHAPTER 7 TRUSTEE TO ABANDON BUSINESS

Debtor hereby moves this court for an order compelling the Chapter 7 Trustee to abandon debtor's business, commonly know as BROWN ENTERPRISES II.

The basis of this motion is that the business, per se, is of nominal or no value, and it is counter to the interests of the bankruptcy estate to be burdened with the potential liability associated with the continued operation of the business during the bankruptcy period. As shown on debtor's petition and schedules, all Financial Accounts and Office Equipment, Furnishings and Supplies including Redding Bank of Commerce checking #0308, Butte Community Bank checking #1001, Safe, 2 filing cabinets, computer, printer, fax, scanner, copy machine, typewriter, 3 calculators, misc. office supplies are of modest value, and have been fully exempted. The conduct of the business by the debtor merely provides for debtor's "wages", and the ability of debtor to continue to earn a living in this manner is wholly consistent with the concept of providing the debtor with a fresh start. As shown in debtor's

1 petition and schedules, the relief requested would not impede creditor's rights and would enable the
2 Chapter 7 Trustee to satisfy concerns as to potential liability.

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5 DATED: 6-24-10



JEFFREY S. OGILVIE
Attorney for Debtor